

WEDEEN & KAVANAGH

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Attorneys for Defendants

Michael A. Bellini, Individually And As A Joint Tenant;

And Judith Bellini, Individually And As A Joint Tenant

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES INVESTOR PROTECTION
CORPORATION,
Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,
Defendant.

Adv. Pro. No. 08-1789 (SMB)
SIPA LIQUIDATION
(Substantively Consolidated)

Adv. Pro. No. 10-04841

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In re:
BERNARD L. MADOFF,
Debtor.

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IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff
Investment Securities LLC
Plaintiff,

v.

MICHAEL A. BELLINI, individually
and as a joint tenant; AND JUDITH
BELLINI, individually and as a joint tenant,
Defendant.

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IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff
Investment Securities LLC
Plaintiff,

Adv. Pro. No. 10-04918

v.

ELLEN BERNFELD,
Defendant.

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IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff
Investment Securities LLC

Plaintiff,

v.

MARILYN BERNFELD TRUST; HERBERT BERNFELD RESIDUARY TRUST, in its own capacity and as a partner of H&E Company- A Partnership and Bernfeld Joint Venture – A Partnership; H&E COMPANY – A PARTNERSHIP; BERNFELD JOINT VENTURE – A PARTNERSHIP; MARILYN BERNFELD, in her capacity as a partner of H&E Company- A Partnership and Bernfeld Joint Venture – A Partnership, and as Trustee for the Marilyn Bernfeld Trust and the Herbert Bernfeld Residuary Trust; ELLEN BERNFELD, in her capacity as a partner of H&E Company- A Partnership and Bernfeld Joint Venture – A Partnership; and THOMAS BERNFELD, in his capacity as a partner of Bernfeld Joint Venture – A Partnership, Defendants.

Adv. Pro. No. 10-05143

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PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law In Support of Defendants Bellini and the Bernfeld Defendants Motion for Reconsideration and/or Vacating of the May 19, 2016 Orders Entering Default Judgments, the Declaration of Timothy Wedeen and the exhibits attached thereto, and all other papers and proceedings in this matter, Defendants, by their undersigned attorneys Wedeen & Kavanagh, will move this Court, before the Hon. Stuart M. Bernstein, in the Bankruptcy Courthouse for the Southern District of New York, One Bowling Green, New York, New York on a date to be designated by the Court, for

reconsideration and/or vacatur of the Orders Entering Default Judgments in favor of plaintiff.

Dated: New York, New York
May 31, 2016

Respectfully submitted,
/s

Wedeen & Kavanagh
By: Timothy Wedeen
Attorneys Defendants
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